

FILED

APR 26 2022

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

BRADLEY GLASPELL,

Defendant.

Criminal No. 1:22-cr-31

Violation: 18 U.S.C. § 1343

TSK/MJA

INFORMATION

The United States Attorney charges that:

COUNT ONE

(Wire Fraud)

1. At all times relevant to this Information, defendant **BRADLEY GLASPELL**, owned and operated Over the Top Roofing, LLC, and Helping Hands Home Improvement, in Rivesville, West Virginia.
2. At all times relevant to this Information, defendant **BRADLEY GLASPELL**, purported to customers of Over the Top Roofing, LLC, and Helping Hands Home Improvement, that the businesses were licensed to conduct home improvement contracting work.
3. At all times relevant to this Information, defendant **BRADLEY GLASPELL**, resided in Salem, West Virginia.
4. Beginning at least in or around June 2019, and continuing until in or around August 2021, defendant **BRADLEY GLASPELL**, devised a scheme and artifice to defraud home improvement customers by obtaining approximately \$542,000, by means of false and fraudulent pretenses, representations, and promises.

5. It was a part of the scheme and artifice that the defendant would have victims sign an agreed proposal for contracting home improvement work to be completed by Over the Top Roofing, LLC, or Helping Hands Improvement.

6. It was a further part of the scheme and artifice that the defendant would have victims pay a down payment of cash or check for materials and supplies before he commenced any home improvement work.

7. It was a further part of the scheme and artifice that the defendant would deposit the down payments into his personal and business bank accounts held at financial institutions in the Northern District of West Virginia.

8. It was a further part of the scheme and artifice that the defendant, after accepting and depositing the down payments, would fail to return to the victims' residences to commence home improvement work, or would commence a minimal amount of work and then never return.

9. It was a further part of the scheme and artifice that the defendant would deposit the down payments into his financial accounts and then withdraw the down payments in cash, instead of applying those payments to business-related expenses.

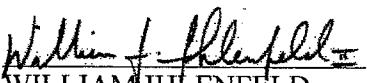
10. It was a further part of the scheme and artifice that the defendant would deposit the down payments into his financial accounts and use those payments for personal lifestyle expenses at retail stores, gas stations, and restaurants, instead of business-related expenses.

11. It was a further part of the scheme and artifice that the defendant would misrepresent and conceal material facts that, during the time victims signed contracts with him, he and his businesses were the subject of several Cease and Desist Orders by the West Virginia Contractor Licensing Board for engaging in contracting work without a valid license.

12. It was a further part of the scheme and artifice that the defendant would misrepresent and lie to victims regarding the reasons he failed to commence or failed to finish home improvement work.

13. It was a further part of the scheme and artifice that the defendant would falsely promise to refund payments to victims who complained about home improvement work not commencing or remaining unfinished.

14. On or about August 10, 2021, in Marion County, in the Northern District of West Virginia, and elsewhere, for the purpose of executing such scheme and artifice, defendant **BRADLEY GLASPELL**, did knowingly cause to be transmitted by means of a wire communication in interstate commerce, writings, signs, signals, pictures, and sounds, that is, the defendant sent a message to K.H. containing a material misstatement regarding a refund for home improvement work not commenced using Facebook Messenger, which traveled from a computer server located in the Northern District of West Virginia, to a computer server located outside the State of West Virginia; in violation of Title 18, United States Code, Section 1343.


WILLIAM J. IHLENFELD
United States Attorney

Danaë DeMasi-Lemon
Assistant United States Attorney